

CERTIFICATE OF SERVICE

Kerri Johnson a Paralegal Specialist in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has, on this 5th day of November, 2007, sent by first class United States mail or electronic mail, as noted, copies of the foregoing "Enforcement Bureau's First Request for Production of Documents to Preferred Communication Systems, Inc."¹ to:

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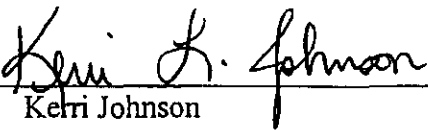
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Attorney for Pendleton C. Waugh

Administrative Law Judge Arthur I. Steinberg*
Federal Communications Commission
445 12th Street, S.W., Room 1-C861

¹ Including confidential attachments, if appropriate.

Washington, D.C. 20054


Kerri Johnson

* Hand-Delivered and Courtesy Copies Sent Via E-Mail

** Courtesy Copies Sent Via E-Mail (E-Mail service acceptable in lieu of hard copies for files 4 MB or less per agreement with counsel.)

ATTACHMENT B

**Federal Communications Commission**

**The FCC Acknowledges Receipt of Comments From ...
Preferred Communication Systems, Inc.
...and Thank You for Your Comments**

Your Confirmation Number is: '20071126202708 '

Date Received: Nov 26 2007

Docket: 07-147

Number of Files Transmitted: 1

DISCLOSURE

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updated 12/11/03

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	EB Docket No. 07-147
)	
PENDLETON C. WAUGH, CHARLES M.)	File No. EB-06-IH-2112
AUSTIN, and JAY R. BISHOP)	NAL/Acct. No. 200732080025
)	
PREFERRED COMMUNICATION)	FRN No. 0003769049
SYSTEMS, INC.)	
)	
Licensee of Various Site-by-Site Licenses)	
in the Specialized Mobile Radio Service)	
)	
PREFERRED ACQUISITIONS, INC.)	FRN No. 0003786183
)	
Licensee of Various Economic Area Licenses)	
in the 800 MHz Specialized Mobile Radio)	
Services)	

To: The Honorable Judge Arthur I. Steinberg

**RESPONSE BY PREFERRED COMMUNICATION SYSTEMS, INC.
TO REQUEST FOR PRODUCTION OF DOCUMENTS**

Preferred Communication Systems, Inc. ("PCSI"), by its attorneys and pursuant to Section 1.325 of the Commission's Rules, hereby responds to the First Request for Production of Documents to Preferred Acquisitions, Inc. ("Document Request"), filed November 5, 2007 by the Enforcement Bureau ("Bureau") herein.

General Objections.

A. Previously-Produced Documents

PCSI objects to having to identify or produce any document whatsoever that was previously produced to the Bureau pre-designation. Bureau counsel already possesses these documents, and is at least as capable as PCSI's counsel in determining whether any such documents are relevant and material. There is nothing in the Commission's rules which

obligates a hearing respondent to perform the Bureau's investigative functions for it. This objection applies to each and every document request.

B. Publicly Available Materials in FCC Files.

PCSI also objects to every request to identify or produce copies of FCC applications or other documents on file with the FCC (such as, for example, filings in rulemaking proceedings) and matters of public record at the FCC, such as FCC decisions. The Bureau can review such publicly available materials already. It would be unduly burdensome and unfair to require PCSI's counsel to have to sift through such materials, at PCSI's expense, to determine which ones might be of interest to the Bureau. This objection applies to each and every document request.

C. Documents Created Post-Designation.

Finally, PCSI objects to every request, to the extent such request seeks to have PCSI identify or produce any document which was created after the release of the *Hearing Designation Order* herein. Aside from the fact that doing so would be unduly burdensome, most if not all such documents were prepared in anticipation of this litigation, and would consist almost entirely of either privileged information or attorney thought processes (*i.e.*, work product). To the limited extent that any such post-designation document might repeat information also contained in one or more pre-designation documents or discovery responses, it is duplicative, and the Bureau has no need to see it.

Specific Answers and Objections.

1. *All formation and organizational Documents relating to PCSI, including, but not limited to, articles of incorporation, by laws, minutes of corporate meetings, appointment or dismissal of directors, issuance or reclassification of stock, employee compensation, sale of major assets, dissolution, agreements, voting rights, proxies, and any and all amendments thereto.* These documents have been requested from corporate counsel to PCSI in Texas, and will be made available when received.

2. All Documents relating to the participation, of any kind and to any extent whatsoever, of Pendleton C. Waugh in the formation and/or operation, day-to-day and otherwise, of PCSI.

PCSI objects to this request as overbroad and unduly burdensome. On its face, this request could pertain to virtually every document ever created pertaining to PCSI. See, also, the general objections above. Notwithstanding the general objections, documents which are not subject to the foregoing objections and which PCSI believes to be responsive to this request are being produced, and are available for inspection at the offices of PCSI's counsel herein. PCSI is continuing to search for documents responsive to this request. If additional documents are located and identified, they will either be produced, or, if withheld based upon a claim of privilege, work product doctrine or otherwise, would be identified by (if known) author, recipient(s), date, title and type of claim.

3. All Documents that Pendleton C. Waugh signed or executed on behalf of PCSI. See the general objections above. Also, PCSI objects to this request as vague, overbroad and unduly burdensome. On its face, this request seeks every single document ever generated by Mr. Waugh over a ten-year period that even mentioned PCSI. Notwithstanding the foregoing objections, documents which are not subject to said objections and which PCSI believes to be responsive to this request are being produced, and are available for inspection at the offices of PCSI's counsel herein. PCSI is continuing to search for documents responsive to this request. If additional documents are located and identified, they will either be produced, or, if withheld based upon a claim of privilege, work product doctrine or otherwise, would be identified by (if known) author, recipient(s), date, title and type of claim.

4. All Documents relating to voting interest or future voting interests in PCSI. See response to request no.1 above. See, also, the general objections above. Notwithstanding the general objections, documents which are not subject to the foregoing objections and which PCSI believes to be responsive to this request are being produced, and are available for inspection at the offices of PCSI's counsel herein. PCSI is continuing to search for documents responsive to

this request. If additional documents are located and identified, they will either be produced, or, if withheld based upon a claim of privilege, work product doctrine or otherwise, would be identified by (if known) author, recipient(s), date, title and type of claim.

5. *All Documents relating to the issuance or future issuance of shares of stock in PCSI.*

See response to request no.4 above.

6. *All Documents relating to trusts for the issuance or future issuance of shares of stock in PCSI.* See response to request no.4 above.

7. *All Documents relating to the issuance or future issuance of financial interests of any kind (other than shares of stock) in PCSI.* See response to request no.4 above.

8. *All books of accounting, including payroll records, for PCSI.* PCSI objects to this request as totally irrelevant. Regarding books of accounting, no PCSI application ever filed with the FCC ever contained any financial certification question, and the *Hearing Designation Order* herein contained no issue pertaining either to PCSI's finances or to any financial certification concerning site-based licenses. This request as it pertains to PCSI's payroll records is an invasion of privacy. PCSI is willing to stipulate that neither Pendleton C. Waugh nor Jay Bishop were ever employees of PCSI and that there are no payroll records for Mr. Waugh or Mr. Bishop.

9. *All documents relating to investors and investments in PCSI.* See response to request no.4 above.

10. *All documents, including but not limited to, agreements, contracts, arrangements or understandings, relating to work performed or work to be performed by Pendleton C. Waugh, of any kind and to any extent whatsoever, on behalf of PCSI.* Documents which are not subject to the general objections and which PCSI believes to be responsive to this request are being produced, and are available for inspection at the offices of PCSI's counsel herein. PCSI is continuing to search for documents responsive to this request. If additional documents are located and identified, they will either be produced, or, if withheld based upon a claim of

privilege, work product doctrine or otherwise, would be identified by (if known) author, recipient(s), date, title and type of claim.

11. *All documents relating to compensation or consideration, of any kind and to any extent whatsoever, made, paid or promised to, Pendleton C. Waugh for work or services of any kind and to any extent whatsoever performed by him on behalf of P[C]SI.* Documents which are not subject to the general objections and which PCSI believes to be responsive to this request are being produced, and are available for inspection at the offices of PCSI's counsel herein. PCSI is continuing to search for documents responsive to this request. If additional documents are located and identified, they will either be produced, or, if withheld based upon a claim of privilege, work product doctrine or otherwise, would be identified by (if known) author, recipient(s), date, title and type of claim.

12. *All Federal income tax returns filed by PCSI, from January 1, 1998, to the present.* PCSI objects to this request. PCSI's tax returns are totally irrelevant to any issue designated herein, and are not likely to lead to the production or preservation of admissible evidence. This request is therefore beyond the scope of proper discovery. As previously mentioned, no PCSI application ever filed with the FCC ever contained any financial certification question, and the *Hearing Designation Order* herein contained no issue pertaining either to PCSI's finances or to any financial certification concerning site-based licenses.

13. *All Documents relating to the establishment of annual budgets, business plans, operating expenses, debt financing, and financing generally for PCSI for the years 1998 to the present.* Documents which are not subject to the general objections and which PCSI believes to be responsive to this request are being produced, and are available for inspection at the offices of PCSI's counsel herein. PCSI is continuing to search for documents responsive to this request. If additional documents are located and identified, they will either be produced, or, if withheld based upon a claim of privilege, work product doctrine or otherwise, would be identified by (if known) author, recipient(s), date, title and type of claim.

14. *All documents related to financial accounts with any banks, financial or other institutions, groups, entities or individuals relating to the receipt, distribution, or allocation of PCSI's funds.* PCSI objects to this request on the grounds that it is irrelevant. No PCSI application filed with the FCC ever contained any financial certification question, and the *Hearing Designation Order* herein contained no issue pertaining either to PCSI's finances or to any financial certification concerning site-based licenses.

15 *All documents relating to hiring, firing, or supervision of the employees, officers, independent contractor, or consultants of PCSI.* Documents which are not subject to the general objections and which PCSI believes to be responsive to this request are being produced, and are available for inspection at the offices of PCSI's counsel herein. PCSI is continuing to search for documents responsive to this request. If additional documents are located and identified, they will either be produced, or, if withheld based upon a claim of privilege, work product doctrine or otherwise, would be identified by (if known) author, recipient(s), date, title and type of claim.

16. *All Documents relating to and/or evidencing Charles M. Austin's knowledge of each of the felony convictions of Pendleton C. Waugh.* There are no such documents, other than those already produced to the Bureau in response to pre-designation requests from the Bureau. See the general objections above.

17. *All Documents relating to and/or evidencing Charles M. Austin's knowledge of each of the felony convictions of Jay R. Bishop.* There are no such documents, other than those already produced to the Bureau in response to pre-designation requests from the Bureau. See the general objections above.

18. *All applications filed or on behalf of PCSI with the Commission and all Documents relating to the planning, preparation, review and filing of such applications.* PCSI objects to producing copies of any FCC applications. See the general objections above. PCSI objects to the remainder of this request as vague and overbroad. On its face, this request could pertain to virtually every document ever created pertaining to PCSI.

Notwithstanding this objection, documents which are not subject to the general objections and which PCSI believes to be responsive to this request are being produced, and are available for inspection at the offices of PCSI's counsel herein. PCSI is continuing to search for documents responsive to this request. If additional documents are located and identified, they will either be produced, or, if withheld based upon a claim of privilege, work product doctrine or otherwise, would be identified by (if known) author, recipient(s), date, title and type of claim.

19. *All documents relating to customers of PCSI and/or customers of services provided by PCSI.* Documents which are not subject to the general objections and which PCSI believes to be responsive to this request are being produced, and are available for inspection at the offices of PCSI's counsel herein. If additional documents responsive to this request are subsequently located and identified, they will either be produced, or, if withheld based upon a claim of privilege, work product doctrine or otherwise, would be identified by (if known) author, recipient(s), date, title and type of claim.

20. *All documents, including but not limited to leases, contracts, arrangements, commitments and/or understandings, relating to antenna towers for stations of which PCSI is or was the licensee.* Documents which are not subject to the general objections and which PCSI believes to be responsive to this request are being produced, and are available for inspection at the offices of PCSI's counsel herein. If additional documents responsive to this request are subsequently located and identified, they will either be produced, or, if withheld based upon a claim of privilege, work product doctrine or otherwise, would be identified by (if known) author, recipient(s), date, title and type of claim.

21. *All Documents relating to the purchase, sale and/or lease of equipment of any kind whatsoever for stations of which PCSI is or was the licensee.* Documents which are not subject to the general objections and which PCSI believes to be responsive to this request are being produced, and are available for inspection at the offices of PCSI's counsel herein. PCSI is

continuing to search for documents responsive to this request. If additional documents are located and identified, they will either be produced, or, if withheld based upon a claim of privilege, work product doctrine or otherwise, would be identified by (if known) author, recipient(s), date, title and type of claim.

22. *All Documents supporting PCSI's answers to the Enforcement Bureau's First Set of Interrogatories to Preferred Communication Systems, Inc.* PCSI objects to this request as overbroad and vague. To the extent it relates to such corroboratory documents upon which PCSI ultimately decides to rely at hearing, it is premature, as discussed in the objection to request no.16 below.

23. *All Documents on which PCSI intends to rely to support any legal or factual premise or defense at any hearing in this proceeding.* PCSI objects to this request as premature. PCSI expects that the Presiding Judge will enter an appropriate pre-hearing order pertaining to the exchange by all parties of those documents which each intends to introduce into evidence at hearing, and PCSI would intend to abide by any such pre-hearing order, which presumably would be reciprocal and apply to the Bureau as well.

Respectfully submitted,

**PREFERRED COMMUNICATION SYSTEMS,
INC.**

By: 

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By: 

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Washington, DC 20033-0428
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November 26, 2007

CERTIFICATE OF SERVICE

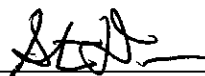
I, Steve Denison, a paralegal at the law firm of Brown, Nietert & Kaufman, Chartered, hereby certify that I have caused a copy of the foregoing **"RESPONSE BY PREFERRED COMMUNICATION SYSTEMS, INC. TO REQUEST FOR PRODUCTION OF DOCUMENTS"** to be sent by electronic mail, this 26th day of November, 2007, to the following:

Hon. Arthur I. Steinberg
Administrative Law Judge
Federal Communications Commission
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Washington, D.C. 20554
Arthur.steinberg@fcc.gov

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Steve Denison

ATTACHMENT C

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FILED/ACCEPTED

NOV - 5 2007

Federal Communications Commission
Office of the Secretary

In the Matter of)	EB Docket No. 07-147
)	
PENDLETON C. WAUGH, CHARLES M.)	File No. EB-06-IH-2112
AUSTIN, and JAY R. BISHOP)	NAL/Acct. No. 200732080025
)	
PREFERRED COMMUNICATION)	FRN No. 0003769049
SYSTEMS, INC.)	
)	
Licensee of Various Site-by-Site Licenses in)	
the Specialized Mobile Radio Service.)	
)	
PREFERRED ACQUISITIONS, INC.)	FRN No. 0003786183
)	
Licensee of Various Economic Area Licenses)	
in the 800 MHz Specialized Mobile Radio)	
Service)	

To: Preferred Communication Systems, Inc.

ENFORCEMENT BUREAU'S FIRST INTERROGATORIES
TO
PREFERRED COMMUNICATION SYSTEMS, INC.

1. The Enforcement Bureau ("Bureau"), pursuant to Sections 1.311 and 1.323 of the Commission's rules, 47 C.F.R. §§ 1.311 and 1.323, submits the following interrogatories to Preferred Communication Systems, Inc. ("PCSI").

2. PCSI shall deliver its responses to the offices of the Investigations and Hearings Division, Enforcement Bureau, Suite 4-C330, 445 12th Street, S.W., Washington, DC 20554 (or at some other location that is mutually acceptable to the Bureau and PCSI) within 14 days of the date of these interrogatories.

3. The obligation of PCSI to answer these interrogatories is continuing in nature. PCSI has an obligation to provide in the future any and all additional responsive

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information that may come to its attention subsequent to its answering these interrogatories but not initially disclosed at the time, date and place set forth herein or in any supplemental answers that it submits. In this regard, PCSI must supplement its initial and supplemental responses if it learns that, in some material respect, the responses initially provided, or as supplemented, were incomplete or incorrect or if additional responsive information is acquired by or has become known to it after its initial or supplemental responses.

Definitions and Instructions

a. As used herein, the term "PCSI" means Preferred Communication Systems, Inc., its subsidiaries and affiliates.

b. The term "Commission" means Federal Communications Commission and includes any and all Bureaus, Divisions, Branches, and offices thereof.

c. The terms "relate to" and "relating to" mean constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or in any way is pertinent to the specified subject, including documents concerning the preparation of the documents.

d. The term "and" also means "or" and the term "or" also means "and."

e. The term "each" also means "every" and the term "every" also means "each."

f. The term "all" also means "any" and the term "any" also means "all."

g. The term "identify" when used with reference to a person or persons, means to state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers.

h. The term "Document" means the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original

because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as will transform such computer materials into easily understandable form) in the possession, custody, or control of PCSI.

i. With regard to each answer, identify the person(s) or document(s) relied upon by PCSI in determining the substance of the answer.

j. The terms "authorization," "authorizations," "license" or "licenses" refer to those licenses identified in footnotes 1-2 of the Commission's Order in the above-captioned proceeding, *Pendleton C. Waugh, et al.*, Order to Show Cause and Notice of Opportunity for Hearing, FCC 07-125, released July 20, 2007, as amended October 22, 2007.

Interrogatories

1. Describe fully PCSI's corporate structure for each year from January 1, 1998, to the present.

2. Identify all officers, directors, shareholders, and creditors of PCSI at any and all times during each year from January 1, 1998, to the present. As to each such person:
 - a. Specify his or her office, title, or position held with PCSI and dates of service in each office or position;
 - b. Specify the nature and extent of his or her stock interest in PCSI, including percentages of ownership and voting rights; and
 - c. If the person no longer is an officer, director, shareholder, and/or creditor of PCSI, specify the date and reason that the person ceased being an officer, director, shareholder, and/or creditor of PCSI.
3. List all stock certificates PCSI has prepared and/or issued since its inception.

For each such stock certificate:

- a. Identify the person or entity to which the stock certificate was prepared or issued;
 - b. specify the amount and class of stock shares;
 - c. specify the date that the stock certificate was prepared and, if also issued, the date that the stock certificate was issued;
 - d. if the stock certificate was prepared, but not issued, explain fully why it was not issued and Identify the persons who were involved in making the decision not to issue the stock certificate.
4. Identify the name of all entities under which PCSI has done business at any time during the period from January 1, 1998, to the present. For each such entity:
 - a. Specify the principal place of business;

- b. Specify the telephone number;
 - c. Specify the dates of operation; and
 - d. Specify the nature of such business.
- 5. Describe any ownership interest in any business that PCSI has held at any time during the period from January 1, 1998, to the present, and, for each such business, provide the dates of operation.
- 6. State whether PCSI has filed federal income tax returns for each year between January 1, 1998, and the present. If not, explain fully why not.
- 7. Describe each and every professional and/or trade license held by PCSI between January 1, 1998, and the present.
- 8. With respect to Station WPMG598 (Aguada, PR):
 - a. State whether PCSI holds the license for this Station;
 - b. State whether PCSI has completed construction of the facilities for this license. If not, explain fully the reasons why PCSI has not completed construction of the facilities for this license;
 - c. State whether PCSI has operated this license continuously since December 2005. If not, specify the date(s) on which PCSI discontinued operations for this license for more than one year.
- 9. State whether Pendleton C. Waugh has ever held an interest of any kind and to any extent whatsoever in PCSI, its applications, and or its licenses. If so, describe fully.

10. State whether Pendleton C. Waugh has ever held an interest of any kind and to any extent whatsoever in PAI, its applications, and or its licenses. If so, describe *fully*.
11. State whether Jay R. Bishop has ever held an interest of any kind and to any extent whatsoever in PCSI, its applications, and or its licenses. If so, describe *fully*.
12. State whether Jay R. Bishop has ever held an interest of any kind and to any extent whatsoever in PAI, its applications, and or its licenses. If so, describe *fully*.
13. State whether Pendleton C. Waugh has ever directly or indirectly held any shares of PCSI stock. If so, specify the number and class of shares that Pendleton C. Waugh has held, the dates of such acquisition, the terms of such acquisition, and the percentage of overall outstanding and issued stock shares those shares represented for every year that Pendleton C. Waugh held such stock.
14. State whether Jay R. Bishop has ever directly or indirectly held any shares of PCSI stock. If so, specify the number and class of shares that Jay R. Bishop has held, the dates of such acquisition, the terms of such acquisition, and the percentage of overall outstanding and issued stock shares those shares represented for every year that Jay R. Bishop held such stock.
15. Identify all contracts, agreements, or understandings, whether oral or written, whether currently in existence or otherwise, of any kind whatsoever, between Pendleton C. Waugh and PCSI.

16. Identify all contracts, agreements, or understandings, whether oral or written, whether currently in existence or otherwise, of any kind whatsoever, between Pendleton C. Waugh and PAI.
17. Identify all contracts, agreements, or understandings, whether oral or written, whether currently in existence or otherwise, of any kind whatsoever, between Jay R. Bishop and PCSI.
18. Identify all contracts, agreements, or understandings, whether oral or written, whether currently in existence or otherwise, of any kind whatsoever, between Jay R. Bishop and PAI.
19. State whether Pendleton C. Waugh has ever entered into any agreements to acquire shares of PCSI stock directly or indirectly. If so, specify the number and class of any shares he agreed to acquire and identify the parties to, dates of, and terms of each such agreement.
20. State whether Jay R. Bishop has ever entered into any agreements to acquire shares of PCSI stock directly or indirectly. If so, specify the number and class of any shares he agreed to acquire and identify the parties to, dates of, and terms of each such agreement.
21. State whether any of the authorizations licensed to PCSI are or ever have been controlled in part or in full by Pendleton C. Waugh. If so, state the type of control or ownership interest. For each ownership interest, state the percentage of such ownership.
22. State whether any of the authorizations licensed to PCSI are or ever have been controlled in part or in full by Jay R. Bishop. If so, state the type of control or

ownership interest. For each ownership interest, state the percentage of such ownership.

23. State whether Pendleton C. Waugh is or at any time has been the real party-in-interest behind any of PCSI's licenses or applications.

24. State whether Jay R. Bishop is or at any time has been the real party-in-interest behind any of PCSI's licenses or applications.

25. State whether PCSI or any individual on behalf of PCSI has entered into a management contract (whether written or otherwise) for control of the day-to-day operations of PCSI. If so, provide the dates, terms, and description of the services/responsibilities of the manager under such contract.

26. Identify all current and former employees of PCSI during the period from January 1, 1998, to the present. As to each such person:

- a. Specify his or her title, position held, job responsibilities, and dates of service in such title and/or position held; and
- b. If the person no longer is an employee of PCSI, specify the date and reason the person left the employment of PCSI.

27. Identify all current and former managers and supervisors of PCSI during the period from January 1, 1998, to the present. As to each such person:

- a. Specify his or her title, position held, job responsibilities, and dates of service in each position held; and
- b. If the person no longer is an employee of PCSI, specify the date and reason the person left the employment of PCSI.

28. Identify all individual(s) that have had unfettered use of all of PCSI's licenses and/or equipment from January 1, 1998, to the present.
29. Identify all individual(s) that have had responsibility for control of PCSI's daily operations from January 1, 1998, to the present.
30. Describe in detail Charles M. Austin's responsibilities for the day-to-day operations of PCSI between January 1, 1998, and the present, including but not limited to (1) supervision of employees; (2) control of directors; (3) FCC filings; (4) debt or operations financing; and (5) revenue generation and allocation. If the nature of such involvement has changed in any way between the period of time from January 1, 1998, to the present, describe fully how such involvement changed.
31. State whether PCSI has ever employed Pendleton C. Waugh. If so, state the dates and terms of such employment, the nature of the services provided by Pendleton C. Waugh, and compensation paid for such services.
32. Describe in detail Pendleton C. Waugh's responsibility for the day-to-day operations of PCSI between January 1, 1998, and the present, including but not limited to (1) supervision of employees; (2) control of directors; (3) FCC filings; (4) debt or operations financing; and (5) revenue generation and allocation. If the nature of such involvement has changed in any way between the period of time from January 1, 1998, to the present, describe fully how such involvement changed.

33. State whether PCSI has ever employed Jay R. Bishop. If so, state the dates and terms of such employment, the nature of the services provided by Jay R. Bishop, and compensation paid for such services.
34. Describe in detail Jay R. Bishop's responsibilities for the day-to-day operations of PCSI between January 1, 1998, and the present, including but not limited to (1) supervision of employees; (2) control of directors; (3) FCC filings; (4) debt or operations financing; and (5) revenue generation and allocation. If the nature of such involvement has changed in any way between the period of time from January 1, 1998, to the present, describe fully how such involvement changed.
35. Identify all individual(s) that have ever been responsible for preparing, filing, or assisting in preparing and filing, Documents on behalf of PCSI with the Commission.
36. State whether Pendleton C. Waugh has ever participated in preparation, filing, or assisting in preparing and filing, of Documents on behalf of PCSI with the Commission. If so, explain fully such participation.
37. Identify all individual(s) that have ever prepared Documents containing the phrase "action items" on behalf of PCSI. Provide a general explanation of the content of each such Document.
38. State whether Pendleton C. Waugh has ever prepared Documents containing the phrase "action items" on behalf of PCSI. If so, explain fully such participation.
39. Identify all individual(s) that have ever prepared, or assisted in preparing, correspondence or other materials to investors on behalf of PCSI. Provide a general explanation of the content of each such Document.

40. State whether Pendleton C. Waugh has ever prepared, or assisted in preparing, correspondence or other materials to investors on behalf of PCSI. If so, explain fully his involvement.
41. Identify all individual(s) that have ever been responsible for negotiating with other parties on behalf of PCSI, such as in contracts, investment agreements, and/or legal proceedings.
42. State whether Pendleton C. Waugh has ever participated in negotiation with other parties on behalf of PCSI, such as in contracts, investment agreements, and/or legal proceedings. If so, explain fully such participation.
43. Identify all individual(s) responsible for the creation of the annual budget for PCSI for each year beginning in 1998 to the present.
44. State whether Pendleton C. Waugh has ever participated in creating the annual budget for PCSI. If so, explain fully such participation.
45. Identify all individual(s) that have been responsible for payment of financing obligations that PCSI has incurred, including expenses arising out of operating, since the date of PCSI's inception.
46. State whether Pendleton C. Waugh has ever fully held or shared responsibility for payment of financing obligations that PCSI has incurred, including expenses arising out of operating. If so, explain fully. If Pendleton C. Waugh has ever shared such responsibility, identify with whom he has shared it.
47. Identify all individual who have ever received consideration of any kind whatsoever, compensation, monies, and/or profits from the operation of PCSI's facilities or business. Describe fully what share, percentage, and/or amount of